Effective Communication on Tobacco Product Risk and FDA Authority: Optimizing Public Display of Information on Tobacco Product Constituents
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## Abstract:

The proposed research builds on studies underway at UNC's P50 Center for Regulatory Research on Tobacco Communication to understand optimal ways to disclose harmful and potentially harmful constituent (HPHC) information to the public. The FDA Center for Tobacco Products is tasked with publicly displaying information about HPHCs in tobacco products and tobacco smoke using a format that is "understandable" and "not misleading to a lay person." To achieve this, we will first need to define these terms in ways that allow behavioral scientists to measure them and design HPHC disclosures that meet legal requirements. Thus, we will meet with legal scholars to better conceptualize the Tobacco Control Act's language regarding comprehension of HPHC disclosures (i.e., "understandable" and "not misleading"). We will then apply this knowledge to the measurement of various website presentation formats and content designed to inform the public about HPHCs. Recent formative studies have found that long lists of unfamiliar chemicals and their quantities are likely to confuse the public. This may be especially problematic for people with lower health literacy. Websites are a platform that may allow for accessible display of HPHC information in a user-friendly and flexible format. Thus, we will identify website presentation formats and content that increase comprehension of constituent disclosures, informed by behavioral science and using evidence-based strategies. We propose to design and pilot test website variations for presenting information about HPHCs in ways that are "understandable" and "not misleading" to the public. After this developmental work, we will conduct an online study with a populationbased national sample of 1,400 adolescents, young adults, and adults, using a panel developed for the parent P50 grant. Analyses of data from this study will identify website characteristics that lead to higher comprehension, with a special emphasis on people with lower health literacy as smoking is associated with having lower literacy. The 1 year time period will require quick and nimble implementation. We have identified a scope of work that our team can achieve in 12 months given that we have previously worked together on very similar projects, will work in parallel on the proposed tasks, will rely on our extensive previous work to develop information formats and measures, and will recruit participants using a rapid-results online study platform and a pre-existing national panel. The proposed work will aid FDA's Center for Tobacco Products as it determines how to inform the public about HPHCs in tobacco products and tobacco smoke. The findings can then be adapted for mobile webpage design and other media as needed.